

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re: BOY SCOUTS OF AMERICA AND DELAWARE BSA, LLC, Debtors.	Chapter 11 Bankruptcy Case No. 20-10343 (LLS) (Jointly Administered)
NATIONAL UNION FIRE INSURANCE CO. OF PITTSBURGH, PA, et al., Appellants, v. BOY SCOUTS OF AMERICA AND DELAWARE BSA, LLC, Appellees.	Case No. 22-cv-01237-RGA (Lead Case) Civ. Nos. 22-1238-RGA, 22-1239- RGA, 22-1240-RGA, 22-1241-RGA, 22-1242-RGA, 22-1243-RGA, 22- 1244-RGA, 22-1245-RGA, 22-1246- RGA, 22-1247-RGA, 22-1249-RGA, 22-1250-RGA, 22-1251-RGA, 22- 1252-RGA, 22-1258-RGA, & 22-1263- RGA (Consolidated)

**NOTICE OF APPEAL TO
UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT**

Appellants Lujan Claimants¹ appeal to the United States Court of Appeals for the Third Circuit from the Opinion [D.I. 150] and Order [D.I. 151] of the district court for the district of Delaware, entered in this case on March 28, 2023, which affirmed the bankruptcy court's Supplemental Findings of Fact and Conclusions of Law and Order Confirming the Third Modified Fifth Amended Chapter 11 Plan of Reorganization (with Technical

¹Lujan Claimants' individual appeal is in Civ. Case No. 22-cv-01258-RGA.

Modifications) for Boy Scouts of America and Delaware BSA, LLC, dated September 8, 2022 [D.I. 1-1].

The parties to the Opinion and Order appealed from and the names and addresses of their respective attorneys are as follows:

<p>Lujan Claimants (Appellants)</p>	<p>LOIZIDES, P.A. Christopher D. Loizides (No. 3968) 1225 North King Street, Suite 800 Telephone: (302) 654-0248 Loizides@loizides.com</p> <p>-and-</p> <p>LUJAN & WOLFF LLP Delia Lujan Wolff Suite 300, DNA Bldg. 238 Archbishop Flores St. Hagatna, Guam 96910 Telephone: (671) 477-8064/5 dslwolff@lawguam.com</p>
<p>Dumas & Vaughn Claimants (Appellants)</p>	<p>GELLERT SCALI BUSENKELL & BROWN LLC Charles J. Brown, III (No. 3368) 1201 N. Orange St., 3rd Floor Wilmington, DE 19801 Telephone: (302) 425-5813 cbrown@gsbblaw.com</p> <p>-and-</p> <p>DUMAS & VAUGHN, LLC Gilion C. Dumas 3835 NE Hancock Street, Suite GLB Portland, OR 97212 Telephone: (503) 616-5007 gilion@dumasandvaughn.com</p>

<p>National Union Fire Insurance Company of Pittsburgh, Pa., Lexington Insurance Company, Landmark Insurance Company, and The Insurance Company of the State of Pennsylvania (the “AIG Companies”) (Appellants)</p>	<p>FINEMAN KREKSTEIN & HARRIS PC Deirdre M. Richards 1300 N. King Street Wilmington, DE 19801 Telephone: (302) 538-8331 Email: drichards@finemanlawfirm.com</p> <p>-and-</p> <p>GIBSON, DUNN & CRUTCHER LLP Michael A. Rosenthal (<i>pro hac vice</i>) Mitchell A. Karlan (<i>pro hac vice</i>) James Hallowell (<i>pro hac vice</i>) Keith R. Martorana (<i>pro hac vice</i>) Seth M. Rokosky (<i>pro hac vice</i>) 200 Park Avenue New York, New York 10166 Telephone: (212) 351-4000 Email: mrosenthal@gibsondunn.com mkarlan@gibsondunn.com jhallowell@gibsondunn.com kmartorana@gibsondunn.com srokosky@gibsondunn.com</p> <p>GIBSON, DUNN & CRUTCHER LLP Theodore J. Boutrous Jr. (<i>pro hac vice</i>) Richard J. Doren (<i>pro hac vice</i>) Blaine H. Evanson (<i>pro hac vice</i>) 333 South Grand Avenue Los Angeles, California 90071 Telephone: (213) 229-7038 Email: rdoren@gibsondunn.com bevanson@gibsondunn.com tboutrous@gibsondunn.com</p> <p>FORAN GLENNON PALANDECH PONZI & RUDLOFF P.C. Susan N.K. Gummow</p>
---	---

	222 N. LaSalle St., Suite 1400 Chicago, Illinois 60601 Telephone: (312) 863-5000 Email: sgummow@fgppr.com
Allianz Global Risks US Insurance Company (Appellant)	<p>TROUTMAN PEPPER HAMILTON SANDERS LLP David M. Fournier (DE Bar No. 2812) Marcy J. McLaughlin Smith (DE No. 6184) Hercules Plaza 1313 Market Street Suite 5100 P.O. Box 1709 Wilmington, DE 19899-1709 Telephone: 404.885.3000 david.fournier@troutman.com marcy.smith@troutman.com</p> <p>-and-</p> <p>PARKER, HUDSON, RAINER & DOBBS LLP Harris B. Winsberg (<i>pro hac vice</i>) Matthew G. Roberts (<i>pro hac vice</i>) 303 Peachtree Street NE Suite 3600 Atlanta, GA 30308 Telephone: 404.420.4313 Facsimile: 404.522.8409 hwinsberg@phrd.com mroberts@phrd.com</p> <p>-and-</p> <p>McDERMOTT WILL & EMERY LLP Margaret H. Warner (<i>pro hac vice</i>) Ryan S. Smethurst (<i>pro hac vice</i>) Alex M. Spisak (<i>pro hac vice</i>) The McDermott Building 500 North Capitol Street, NW</p>

	<p>Washington, DC 20001-1531 Telephone: 202.756.8228 Facsimile: 202.756.8087 mwarner@mwe.com rsmethurst@mwe.com aspisak@mwe.com</p>
<p>National Surety Corporation and Interstate Fire & Casualty Company (Appellants)</p>	<p>TROUTMAN PEPPER HAMILTON SANDERS LLP David M. Fournier (DE Bar No. 2812) Marcy J. McLaughlin Smith (DE No. 6184) Hercules Plaza, Suite 5100 1313 Market Street P.O. Box 1709 Wilmington, DE 19899-1709 Telephone: 302.777.6500 Facsimile: 302.421.8390 david.fournier@troutman.com marcy.smith@troutman.com</p> <p>-and-</p> <p>PARKER, HUDSON, RAINER & DOBBS LLP Harris B. Winsberg (<i>pro hac vice</i>) Matthew G. Roberts (<i>pro hac vice</i>) 303 Peachtree Street NE Suite 3600 Atlanta, GA 30308 Telephone: 404.420.4313 Facsimile: 404.522.8409 hwinsberg@phrd.com mroberts@phrd.com</p> <p>-and-</p> <p>BRADLEY RILEY JACOBS PC Todd C. Jacobs (<i>pro hac vice</i>) John E. Bucheit (<i>pro hac vice</i>) Paul J. Esker (<i>pro hac vice</i>)</p>

	500 West Madison Street Suite 1000 Chicago, IL 60661 Telephone: 312.281.0295 tjacobs@bradleyriley.com jbuchheit@bradleyriley.com pesker@bradleyriley.com
Arch Insurance Company (Appellant)	SMITH, KATZENSTEIN & JENKINS LLP Kathleen M. Miller (No. 2898) 1000 West Street, Suite 501 P.O. Box 410 Wilmington, DE 19899 Telephone: (302) 652-8400 kmiller@skjlaw.com HANGLEY ARONCHICK SEGAL PUDLIN & SCHILLER Ronald P. Schiller (<i>pro hac vice</i>) Matthew A. Hamermesh (<i>pro hac vice</i>) One Logan Square, 27th Floor Philadelphia, PA 19103 T: (215) 568-6200 F: (215) 568-0300 E: rschiller@hangley.com mhamermesh@hangley.com
Argonaut Insurance Company and Colony Insurance Company (Appellants)	POST & SCHELL, P.C. Paul Logan (No. 3339) 300 Delaware Avenue, Suite 1380 Wilmington, DE 19801 Telephone: (302) 251-8856 Email: plogan@postschell.com POST & SCHELL, P.C. John C. Sullivan (<i>pro hac vice</i>) Kathleen K. Kerns (<i>pro hac vice</i>) Four Penn Center – 13th Floor 1600 John F. Kennedy Boulevard Philadelphia, PA 19103

	<p>Telephone: (215) 587-1000 jsullivan@postschell.com kkerns@postschell.com</p> <p>-and-</p> <p>IFRAH PLLC George R. Calhoun (<i>pro hac vice</i>) 1717 Pennsylvania Avenue, N.W. Suite 650 Washington, DC 20006 Telephone: (202) 840-8758 george@ifrahlaw.com</p>
Arrowood Indemnity Company (Appellant)	<p>JOYCE, LLC Michael J. Joyce (No. 4563) 1225 King Street, Suite 800 Wilmington, DE 19801 Telephone: (302) 388-1944 Email: mjoyce@mjlawoffices.com</p> <p>-and-</p> <p>COUGHLIN MIDLIGE & GARLAND, LLP Kevin Coughlin (<i>pro hac vice</i>) Lorraine Armenti (<i>pro hac vice</i>) Michael Hrinewski (<i>pro hac vice</i>) 350 Mount Kemble Avenue PO Box 1917 Morristown, NJ 07962 Telephone: (973) 267-0058 Facsimile: 973-267-6442 kcoughlin@cmg.law larmenti@cmg.law mhrinewski@cmg.law</p> <p>-and-</p> <p>CARRUTHERS & ROTH, P.A. Britton C. Lewis</p>

	<p>John M. Flynn 235 N. Edgeworth Street P.O. Box 540 Greensboro, NC 27401 Telephone: (336) 478-1146 Facsimile: (336) 478-1145 jmf@crlaw.com bcl@crlaw.com</p>
Continental Insurance Company and Columbia Casualty Company (Appellants)	<p>GOLDSTEIN & MCCLINTOCK LLP Maria Aprile Sawczuk (DE #3320) 501 Silverside Road Wilmington, DE 19809 302-444-6710 marias@goldmclaw.com</p> <p>-and-</p> <p>LOEB & LOEB LLP Laura McNally (<i>pro hac vice</i>) Emily Stone (<i>pro hac vice</i>) 321 N. Clark Street, Suite 2300 Chicago, IL 60654 312-464-3155 lmcnally@loeb.com estone@loeb.com</p>
Gemini Insurance Company (Appellant)	<p>WERB & SULLIVAN LEGAL ARTS BUILDING Brian A. Sullivan (No. 2098) 1225 N. King Street Suite 600 Wilmington, Delaware 19801 Telephone: (302) 652-1100 Cell: (302) 757-9932 Facsimile: (302) 652-1111 Email: bsullivan@werbsullivan.com</p> <p>GIEGER LABORDE & LAPEROUOSE, LLC</p>

	<p>John E.W. Baay II (<i>pro hac vice</i>) 701 Poydras Street Suite 4800 New Orleans, LA 70139 Tel.: 504-561-0400 Fax: 504-561-1011 Email: jbaay@glllaw.com</p> <p>-and-</p> <p>KIERNAN TREBACH LLP William H. White Jr (<i>pro hac vice</i>) 1233 20th Street, NW 8th Floor Washington, DC 20036 Tel.: 202-712-7000 Fax: 202-712-7100 Email: wwwhite@kiernantrebach.com</p>
General Star Indemnity Company (Appellant)	<p>SMITH, KATZENSTEIN & JENKINS LLP Kathleen M. Miller (DE Bar No. 2898) 1000 West Street, Suite 501 P.O. Box 410 Wilmington, DE 19899 Telephone: (302) 652-8400 Email: kmiller@skjlaw.com</p> <p>-and-</p> <p>WILEY REIN LLP Mary E. Borja (<i>pro hac vice</i>) Gary P. Seligman (<i>pro hac vice</i>) Ashley L. Criss (<i>pro hac vice</i>) 2050 M Street NW Washington, DC 20036 Phone: (202) 719-7000 Email: mborja@wiley.law gseligman@wiley.law acriss@wiley.law</p>

<p>Great American Assurance Company, f/k/a Agricultural Insurance Company; Great American E&S Insurance Company, f/k/a Agricultural Excess and Surplus Insurance Company; and Great American E&S Insurance Company (Appellants)</p>	<p>BODELL BOVÉ, LLC Bruce W. McCullough (No. 3112) 1225 N. King Street, Suite 1000 Wilmington, Delaware 19801-3250 Telephone: (302) 655-6749 bmccullough@bodellbove.com</p> <p>-and-</p> <p>CLYDE & CO US LLP Bruce D. Celebrezze (<i>pro hac vice</i>) 150 California Street 15th Floor San Francisco, California 94111 Telephone: (415) 365-9800 Facsimile: (415) 365-9801 bruce.celebrezze@clydeco.us</p> <p>CLYDE & CO US LLP Konrad R. Krebs (<i>pro hac vice</i>) 340 Mt. Kemble Avenue Suite 300 Morristown, NJ 07960 Telephone: (973) 210-6700 Facsimile: (973) 210-6701 konrad.krebs@clydeco.us</p> <p>-and-</p> <p>DAVID CHRISTIAN ATTORNEYS LLC David Christian (<i>pro hac vice</i>) 105 W. Madison St., Suite 1400 Chicago, Illinois 60602 Telephone: (312) 282-5282 dchristian@dca.law</p>
<p>Indian Harbor Insurance Company, on behalf of itself and as successor in interest to Catlin</p>	<p>SMITH, KATZENSTEIN & JENKINS LLP Kathleen M. Miller (No. 2898) 1000 West Street, Suite 1501 P.O. Box 410</p>

<p>Specialty Insurance Company (Appellant)</p>	<p>Wilmington, DE 19899 [Courier 19801] Telephone: (302) 652-8400 Facsimile: (302) 652-8405 kmiller@skjlaw.com</p> <p>and</p> <p>MOUND COTTON WOLLAN & GREENGRASS LLP Lloyd A. Gura (<i>pro hac vice</i>) Pamela J. Minetto (<i>pro hac vice</i>) One New York Plaza 44th Floor New York, NY 10004 Tel: (212) 804-4282 lgura@moundcotton.com pminetto@moundcotton.com</p>
<p>Liberty Mutual Insurance Company, The Ohio Casualty Insurance Company, Liberty Insurance Underwriters, Inc. and Liberty Surplus Insurance Corporation (Appellants)</p>	<p>SEITZ, VAN OGTROP & GREEN, P.A. R. Karl Hill (DE Bar No. 2747) 222 Delaware Avenue Suite 1500 Wilmington, DE 19801 Telephone: (302) 888-0600 khill@svglaw.com</p> <p>-and-</p> <p>CHOATE, HALL & STEWART LLP Douglas R. Gooding (<i>pro hac vice</i>) Jonathan D. Marshall (<i>pro hac vice</i>) Two International Place Boston, MA 02110 Telephone: (617) 248-5000 dgooding@choate.com jmarshall@choate.com</p> <p>-and-</p>

	MINTZ, LEVIN, COHN, FERRIS, GLOVSKY AND POPEO PC Kim V. Marrkand (<i>pro hac vice</i>) One Financial Center Boston, MA 02111 Telephone: (617) 542-6000 kvmarrkand@mintz.com
Munich Reinsurance America, Inc., formerly known as American Re-Insurance Company (Appellant)	DILWORTH PAXSON LLP Thaddeus J. Weaver (DE Bar. No. 2790) 704 N. King Street, Suite 500 P.O. Box 1031 Wilmington, DE 19899-1031 (302) 571-8867 (telephone) (302) 351-8735 (facsimile) tweaver@dilworthlaw.com -and- DILWORTH PAXSON LLP William E. McGrath, Jr. (<i>pro hac vice</i>) 2 Research Way, Suite 103 Princeton, NJ 08540 (609) 924-6000 (telephone) (215) 893-8537 (facsimile) wmcgrath@dilworthlaw.com
Traders and Pacific Insurance Company, Endurance American Specialty Insurance Company, and Endurance American Insurance Company (Appellants)	COZEN O'CONNOR Marla S. Benedek (No. 6638) 1201 N. Market Street, Suite 1001 Wilmington, DE 19801 Telephone: (302) 295-2024 Facsimile: (302) 250-4498 mbenedek@cozen.com
Old Republic Insurance Company (Appellant)	MORRIS JAMES LLP Stephen M. Miller (No. 2610) Carl N. Kunz, III (No. 3201) 500 Delaware Avenue, Suite 1500 Wilmington, Delaware 19801

	<p>Telephone: (302) 888-6800 Facsimile: (302) 571-1750 smiller@morrisjames.com ckunz@morrisjames.com</p> <p>-and-</p> <p>FOX SWIBEL LEVIN & CARROLL LLP Margaret M. Anderson (<i>pro hac vice</i>) Ryan T. Schultz (<i>pro hac vice</i>) Adam A. Hachikian (<i>pro hac vice</i>) Kenneth M. Thomas (<i>pro hac vice</i>) 200 W. Madison Street, Suite 3000 Chicago, Illinois 60606 Telephone: (312) 224-1200 Facsimile: (312) 224-1201 panderson@foxswibel.com rschultz@foxswibel.com ahachikian@foxswibel.com kthomas@foxswibel.com</p>
Travelers Casualty and Surety Company, Inc. (f/k/a Aetna Casualty & Surety Company), St. Paul Surplus Lines Insurance Company and Gulf Insurance Company (Appellants)	<p>REGER RIZZO & DARNALL LLP Louis J. Rizzo, Jr. (DE Bar No. 3374) 1521 Concord Pike Suite 305 Brandywine Plaza West Wilmington DE 19803 Telephone: (302) 477-7100 Facsimile: (302) 652-3620 lrizzo@regerlaw.com</p>
Boy Scouts of America, Delaware BSA, LLC (Debtors/Appellees and Debtors in Possession)	<p>MORRIS, NICHOLS, ARSHT & TUNNELL LLP Derek C. Abbott (No. 3376) Andrew R. Remming (No. 5120) Paige N. Topper (No. 6470) 1201 North Market Street, 16th Floor P.O. Box 1347 Wilmington, Delaware 19899-1347</p>

Telephone: (302) 658-9200
dabbott@morrisnichols.com
aremning@morrisnichols.com
ptopper@morrisnichols.com

– and –

WHITE & CASE LLP

Jessica C. Lauria (*pro hac vice*)
Glenn M. Kurtz (*pro hac vice*)
1221 Avenue of the Americas
New York, New York 10020
Telephone: (212) 819-8200
Email: jessica.lauria@whitecase.com
gkurtz@whitecase.com

– and –

WHITE & CASE LLP

Michael C. Andolina
Matthew E. Linder
Laura E. Baccash
Blair M. Warner
111 South Wacker Drive
Chicago, Illinois 60606
Telephone: (312) 881-5400
mandolina@whitecase.com
mlinder@whitecase.com
laura.baccash@whitecase.com
blair.warner@whitecase.com

– and –

WHITE & CASE LLP

Ronald K. Gorsich
Doah Kim
555 South Flower Street, Suite 2700
Los Angeles, CA 90071
Telephone: (213) 620-7700

	rgorsich@whitecase.com doah.kim@whitecase.com
Tort Claimants' Committee (Appellee)	PACHULSKI STANG ZIEHL & JONES LLP Richard M. Pachulski (<i>pro hac vice</i>) Alan J. Kornfeld (<i>pro hac vice</i>) Debra I. Grassgreen (<i>pro hac vice</i>) Iain A.W. Nasatir (<i>pro hac vice</i>) James E. O'Neill (No. 4042) 919 North Market Street, 17th Floor P.O. Box 8705 Wilmington, DE 19899-8705 (Courier 19801) Telephone: (302) 652-4100 Fax: (302) 652-4400 Email: rpachulski@pszjlaw.com akornfeld@pszjlaw.com dgrassgreen@pszjlaw.com inasatir@pszjlaw.com joneill@pszjlaw.com
Coalition of Abused Scouts for Justice (Appellee)	MONZACK MERSKY AND BROWDER, P.A. Rachel B. Mersky (No. 2049) 1201 North Orange Street, Suite 400 Wilmington, Delaware 19801 Telephone: (302) 656-8162 Fax: (302) 656-2769 Email: rmersky@monlaw.com –and– BROWN RUDNICK LLP David J. Molton, Esq. (<i>pro hac vice</i>) Eric R. Goodman, Esq. (<i>pro hac vice</i>) Seven Times Square New York, NY 10036 Telephone: (212) 209-4800 Fax: (212) 209-4801 Email: dmolton@brownrudnick.com egoodman@brownrudnick.com

	<p>–and–</p> <p>BROWN RUDNICK LLP Sunni P. Beville, Esq. (<i>pro hac vice</i>) Tristan G. Axelrod, Esq. (<i>pro hac vice</i>) One Financial Center Boston, MA 02111 Telephone: (617) 856-8200 Fax: (617) 856-8201 Email: sbeville@brownrudnick.com taxelrod@brownrudnick.com</p>
Future Claimants’ Representative (Appellee)	<p>YOUNG CONAWAY STARGATT & TAYLOR, LLP Robert S. Brady (No. 2847) Edwin J. Harron (No. 3396) Kenneth J. Enos (No. 4544) Ashley E. Jacobs (No. 5635) Rodney Square 1000 North King Street Wilmington, Delaware 19801 Telephone: (302) 571-6600 Fax: (302) 571-1253 Email: rbrady@ycst.com eharron@ycst.com kenos@ycst.com ajacobs@ycst.com</p> <p>–and–</p> <p>GILBERT LLP Kami E. Quinn (<i>pro hac vice</i>) Rachel H. Jennings (<i>pro hac vice</i>) Kyle Y. Dechant (<i>pro hac vice</i>) December L. Huddleston (<i>pro hac vice</i>) 700 Pennsylvania Ave, SE Suite 400 Washington, DC 20003 Telephone: (202) 772-2200 Fax: (202) 772-3333</p>

	Email: quinnk@gilbertlegal.com jenningsr@gilbertlegal.com dechank@gilbertlegal.com huddlestond@gilbertlegal.com
The Zalkin Law Firm, P.C. and Pfau Cochran Vertetis Amala PLLC (Appellees)	KTBS LAW LLP Thomas E. Patterson (<i>pro hac vice</i>) Daniel J. Bussel (<i>pro hac vice</i>) Robert J. Pfister (<i>pro hac vice</i>) Sasha M. Gurvitz (<i>pro hac vice</i>) 1801 Century Park East, Twenty-Sixth Floor Los Angeles, California 90067 Telephone: (310) 407-4000 Fax: (310) 407-9090 Email: tpatterson@ktbslaw.com dbussel@ktbslaw.com rpfister@ktbslaw.com sgurvitz@ktbslaw.com -and- BIELLI & KLAUDER, LLC David M. Klauder, Esquire (No. 5769) 1204 N. King Street Wilmington, DE 19801 Telephone: (302) 803-4600 Fax: (302) 397-2557 Email: dklauder@bk-legal.com
Hartford Accident and Indemnity Company, First State Insurance Company, Twin City Fire Insurance Company, and Navigators Specialty Insurance Company (Appellees)	BAYARD, P.A. Erin R. Fay (No. 5268) Gregory J. Flasser (No. 6154) 600 North King Street, Suite 400 Wilmington, DE 19801 Telephone: (302) 655-5000 Fax: (302) 658-6395 Email: efay@bayardlaw.com gflasser@bayardlaw.com -and-

	<p>RUGGERI PARKS WEINBERG LLP James P. Ruggeri (<i>pro hac vice</i>) Joshua D. Weinberg (<i>pro hac vice</i>) 1875 K Street, N.W., Suite 600 Washington, D.C. 20006-1251 Telephone: (202) 469-7750 Fax: (202) 469-7751 Email: jruggeri@ruggerilaw.com jweinberg@ruggerilaw.com</p> <p>-and-</p> <p>WILMER CUTLER PICKERING HALE AND DORR LLP Philip D. Anker (<i>pro hac vice</i>) 7 World Trade Center 250 Greenwich Street New York, N.Y. 10007 Telephone: (212) 230-8890 Fax: (212) 230-8888 Email: philip.anker@wilmerhale.com</p> <p>Joel Millar (<i>pro hac vice</i>) 1875 Pennsylvania Avenue N.W. Washington, D.C. 20006 Telephone: (202) 663-6000 Fax: (202) 663-6363 Email: joel.millar@wilmerhale.com</p>
<p>Century Indemnity Company, as successor to CCI Insurance Company, as successor to Insurance Company of North America and Indemnity Insurance Company of North</p>	<p>STAMOULIS & WEINBLATT LLC Stamatios Stamoulis (No. 4606) 800 N. West Street Third Floor Wilmington, Delaware 19801 Telephone: 302 999 1540 Fax: 302 762 1688 Email: stamoulis@swdelaw.com</p> <p>-and-</p>

<p>America (Appellees)</p>	<p>O'MELVENY & MYERS LLP Tancred Schiavoni (<i>pro hac vice</i>) Times Square Tower 7 Times Square New York, New York 10036-6537 Telephone: (212) 326-2000 Fax: (212) 326-2061 Email: tschiavoni@omm.com</p> <p>O'MELVENY & MYERS LLP Stephen Warren (<i>pro hac vice</i>) 400 South Hope Street Los Angeles, California 90071 Telephone: (213) 430-6000 Fax: (213) 430-6407 Email: swarren@omm.com</p> <p>O'MELVENY & MYERS LLP Jonathan D. Hacker (<i>pro hac vice</i>) 1625 Eye Street, N.W. Washington, D.C. 20006 Telephone: (202) 383-5300 Email: jhacker@omm.com</p>
<p>Federal Insurance Company and Westchester Fire Insurance Company (Appellees)</p>	<p>STAMOULIS & WEINBLATT LLC Stamatios Stamoulis (No. 4606) 8000 N. West Street, Third Floor Wilmington, Delaware 19801 Telephone: (302) 999-1540 Email: stamoulis@swdelaw.com</p> <p>-and-</p> <p>SIMPSON THACHER & BARTLETT LLP David Elbaum (<i>pro hac vice</i>) 425 Lexington Avenue New York, New York 10017 Telephone: (212) 455-2000</p>

	Email: david.elbaum@stblaw.com
American Zurich Insurance Company, American Guarantee Insurance Company, and Steadfast Insurance Company (Appellees)	<p>TYBOUT, REDFEARN & PELL Robert D. Cecil, Jr. (No. 5317) 501 Carr Road, Suite 300 Wilmington, Delaware 19899 Telephone: (302) 658-6901 Email: rcecil@trplaw.com</p> <p>-and-</p> <p>CROWELL & MORING LLP Mark D. Plevin (<i>pro hac vice</i>) Kevin D. Cacabelos (<i>pro hac vice</i>) Three Embarcadero Center, 26th Floor San Francisco, California 94111 Telephone: (415) 986-2800 Email: mplevin@crowell.com kcacabelos@crowell.com</p> <p>Tacie H. Yoon (<i>pro hac vice</i>) Rachel A. Jankowski (<i>pro hac vice</i>) 1001 Pennsylvania Ave., N.W. Washington, D.C. 20004 Telephone: (202) 624-2500 Email: tyoon@crowell.com rjankowski@crowell.com</p>
Clarendon National Insurance Company, as successor in interest by merger to Clarendon America Insurance Company; River Thames Insurance Company Limited (as successor in interest to Unionamerica Insurance Company	<p>BALLARD SPAHR LLP Matthew G. Summers (No. 5533) Chantelle D. McClamb (No. 5978) 919 N. Market Street, 11th Floor Wilmington, Delaware 19801-3034 Telephone: (302) 252-4428 Fax: (302) 252-4466 Email: summersm@ballardspahr.com mcclamb@ballardspahr.com</p> <p>-and-</p>

<p>Limited, on its own behalf and in turn as successor to St. Katherine Insurance Company Limited); and Zurich American Insurance Company, as successor to Maryland Casualty Company, Zurich Insurance Company, and Maryland General Insurance Company (Appellees)</p>	<p>STEPTOE & JOHNSON LLP Harry Lee (<i>pro hac vice</i>) John O'Connor (<i>pro hac vice</i>) 1330 Connecticut Avenue NW Washington, DC 20036 Telephone: (202) 429-8078 Fax: (202) 429-3902 Email: hlee@steptoe.com joconnor@steptoe.com</p>
<p>Ad Hoc Committee of Local Councils of the Boy Scouts of America (Appellee)</p>	<p>DLA PIPER, LLP (US) R. Craig Martin (No. 5032) 1201 North Market Street, Suite 2100 Wilmington, Delaware 19801-1147 Telephone: (302) 468-5655 Email: craig.martin@dlapiper.com</p> <p>-and-</p> <p>WACHTELL, LIPTON, ROSEN & KATZ Richard G. Mason (<i>pro hac vice</i>) Douglas K. Mayer (<i>pro hac vice</i>) Joseph C. Celentino (<i>pro hac vice</i>) Mitchell S. Levy (<i>pro hac vice</i>) 51 West 52nd Street New York, New York 10019 Telephone: (212) 403-1000 Email: RGMason@wlrk.com DKMayer@wlrk.com JCCelentino@wlrk.com MSLevy@wlrk.com</p>

Dated: Wilmington, Delaware

April 10, 2023

Respectfully Submitted,

/s/ Christopher D. Loizides
Christopher D. Loizides (No. 3968)
LOIZIDES, P.A.
1225 North King Street, Suite 800
Wilmington, DE 19801
Phone: 302.654.0248
Email: Loizides@loizides.com

and

LUJAN & WOLFF LLP

/s/ Delia Lujan Wolff
Delia Lujan Wolff
Suite 300, DNA Bldg.
238 Archbishop Flores St.
Hagatna, Guam 96910
Phone: (671) 477-8064/5
Facsimile: (671) 477-5297
Email: dslwolff@lawguam.com

Attorneys for Lujan Claimants

APPENDIX A

The foregoing Notice of Appeal was filed by the following creditors who each filed a Sexual Abuse Survivor Proof of Claim and are represented by Lujan & Wolff LLP. The numbers below are the claim numbers for each creditor's Sexual Abuse Survivor Proof of Claim, including amendments thereto.

248	2991	6824	25063	79403
1551	3051	7976	25069	79769
1670	3120	7977	33028	80328
1677	3385	8037	35352	80655
1746	3610	8038	35354	80982
1757	3612	10548	38591	87715
1765	3614	11250	40889	87757
1913	3616	11251	40890	96418
1953	4855	14187	45700	96419
2003	4857	15104	45702	103377
2010	4859	15139	48168	103378
2011	5646	17480	58317	4858
2394	5646	18860	58370	4860
2403	5648	18873	67267	
2433	5655	22872	67286	
2597	6432	22873	67293	
2840	6434	22874	73585	
2885	6823	23388	73607	